

From: [McKenna, James \(Jim\)](#)
To: [Eric Blischke/R10/USEPA/US@EPA](#)
Cc: [ANDERSON Jim M](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [Carl Stivers](#); [Kristine Koch/R10/USEPA/US@EPA](#); [ricka@bes.ci.portland.or.us](#); [rjw@nwnatural.com](#); [TARNOW Karen@deq.state.or.us](#); [Valerie Oster](#)
Subject: RE: Stormwater Tech Subgroup
Date: 12/15/2006 01:47 PM

Thanks Eric, here are a few responses to your five points:

1) One of my concerns about the schedule is that the current list has only been reviewed by a sub-set of the tech team. I think it has now been circulated to the entire tech team, and they should be providing their respective comments during the Monday morning meeting. Hopefully there aren't any major disconnects. If so, this is where the Management Team needs to step in.

2) Yes, we need to do this once. Let's have the tech folks tell us if there is an adverse schedule impact.

3) The tech team is meeting Monday, and they should provide feedback/recommendations to the Management Team by Wednesday.

4) Development of the FSP should be a collaborative effort, and I think it makes sense to have Carl take the lead. In terms of LWG buy-in, I think there will be two stages: a) run the list of sites and methodologies, with estimated cost, past Exec to make sure it is consistent with the LWG Senior Managers expectations (maybe as early as next Wednesday, if the tech team can come to consensus Monday); and b) Carl will then work collaboratively with DEQ, EPA and its partners to generate the FSP (Carl, we have not talked about how long this may take). Once the draft FSP is developed we will seek Exec approval (I do not anticipate any problems or delays with getting Exec approval, since the draft will have EPA and DEQ stamp of approval).

5) Lucky Keith! If he has any questions or needs assistance have him contact me.

Again thanks Eric. Hope everyone has a great weekend. Jim.

-----Original Message-----

From: Blischke.Eric@epamail.epa.gov
[mailto:Blischke.Eric@epamail.epa.gov]
Sent: Friday, December 15, 2006 1:13 PM
To: McKenna, James (Jim)
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Subject: Re: Stormwater Tech Subgroup

Jim, I too did not see anything. I agree that time is of the essence and that we should resolve sites and techniques by the middle of next week. It seems that we are very close. I see the steps as follows:

1) Confirm the sites to be sampled. The current list has been vetted between the technical team and management team. I would suggest that unless there are any red flags or glaring omissions that we go with what we have. What is more important is to get the project manager input and select the appropriate outfall for sampling.

2) Finalize the technical approach. Based on our discussion, the two key outstanding issues have to do with total vs. dissolved contaminants and phthalates. At our management meeting, it seems like we wanted to err on the side of getting more rather than less. I agree with this unless there are some implementation issues that would delay or getting out into the field by February 1, 2007.

3) We agreed to have one more technical meeting to resolve the sites and the approach. This needs to happen by Wednesday or Thursday.

4) I think we agreed that Carl would take the lead on this effort but that the development of the plan needed to be a collaborative process to avoid a lengthy review, comment and approval step. It is unclear to me what additional LWG approval will be needed to have Carl participate in the plan development. However, the sooner this can happen the better to begin development of the plan.

5) Regarding access at non-LWG sites, Keith Johnson is looking at the steps necessary to have the LWG and its contractors act as DEQ's agent under the terms of their agreements.

Regarding the DQOs, EPA agrees that the primary objective of this effort is to meet DQO's 1 and 2 (contribution to water column risk and contribution to sediment risk). DQO # 3 (source tracing) is not an objective of this work although this effort would certainly help identify where source tracing needs to take place.

I will be [REDACTED] office early next week but can be reached via cell phone at (b) (6).

Eric

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12/15/2006 12:07
PM

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Subject
Stormwater Tech Subgroup

Eric, Chip and Jim:

It may be buried in my email inbox, but I do not recall seeing any follow-up from our Management Team meeting Wednesday about the path forward for the stormwater tech subgroup. Since we are down to the wire in terms of settling the list of sites and the appropriate methodologies, I thought I would circulate my thoughts on the subject:

A) Since time is of the essence, I would like to see the tech subgroup come to resolution by mid-next week. It would be great if they can reach consensus on the list and locations of each sample, and the appropriate methodologies. If not, the tech subgroup should report to the management team and highlight any impasse(s). I think we as managers should weigh the options and attempt to come to agreement on a path forward. It is critical to do so in a timely manner, because the final package will have to go before LWG Exec for approval (i.e., to ensure it meets the conditions set by our Senior Managers). Eric, I know you are concerned about this parliamentary step, but it is an unavoidable procedure we must go through. Having the tech subgroup wrap-up next week will help us get through Exec by end of December.

B) As I stated Wednesday, Karen's summary memo did a good job of laying out the process. However, I believe it is critical to restate the three DQOs at the beginning of the memo, with the recognition that DQOs 1 and 2 (impact to surface water and recontamination of sediment) are shared by the LWG in-water RI/FS and the DEQ JSCS. DQO 3 (source tracing) is strictly a source control objective, and therefore not part of this shared effort (Kristine, I think you did a good job articulating this point Wednesday). A clear representation of the DQOs will help the tech subgroup establish that the list of sites and sampling locations, and the sampling/analytical methodologies, are appropriate and adequate for addressing DQOs 1 and 2 (this is similar to the table Carl generated, and the tech subgroup may want to use this as a starting point).

I hope this helps, and if others have comments or suggestions about the path forward please feel free to chime in.

Thanks,

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